

Mark S. O'Connor (011029)
BEUS GILBERT PLLC
701 North 44th St.
Phoenix, AZ 85008
Telephone: (480) 429-3000
moconnor@beusgilbert.com

James R. Condo (#005867)
Kristine L. Gallardo (#033975)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2204
Telephone: (602) 382-6000
jcondo@swlaw.com
kgallardo@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

*Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation

No. 2:15-MD-02641-DGC

THE PARTIES' NOTICE OF FILING SUBMISSION REGARDING REMAND OR TRANSFER OF CERTAIN CASES

(Assigned to the Honorable David G. Campbell)

1 Pursuant to Case Management Order No. 42 (Doc. 16343 at 7), and the Court's
2 Order dated June 27, 2019 (Doc. 18877), the Plaintiffs and Defendants C. R. Bard, Inc.
3 and Bard Peripheral Vascular, Inc. hereby submit the attached report for the Court's
4 consideration regarding the MDL cases.

5 The following materials are attached:

6 Exhibit "A" – A list of pertinent orders to be attached to the report provided to the
7 transferor courts, referenced as "Exhibit 1" in the joint proposed report;

8 Exhibit "B" – A list of exhibits admitted at the bellwether trials (excluding case-
9 specific medical records) and documents deemed no longer subject to the Protective
10 Order, referenced as "Exhibit 2" in the joint proposed report;

11 Exhibit "C" – A joint proposed report of the MDL by the parties; and

12 Exhibit "D" – A stipulated designation of record to be sent with remanded and
13 transferred cases.

14 The parties stand ready to address any questions the Court may have.

15 RESPECTFULLY SUBMITTED this 10th day of July, 2019.

16 BEUS GILBERT PLLC

NELSON MULLINS RILEY &
SCARBOROUGH, LLP

18 By: /s/ Mark O'Connor (with permission) By: /s/ Richard B. North, Jr.
Mark S. O'Connor (011029) Richard B. North, Jr. (*pro hac vice*)
19 701 North 44th St. Georgia Bar No. 545599
Phoenix, AZ 85008 Matthew B. Lerner (*pro hac vice*)
20 Ramon Rossi Lopez Georgia Bar No. 446986
(admitted *pro hac vice*) Atlantic Station
CA Bar No. 86361 201 17th Street, NW / Suite 1700
22 LOPEZ MCHUGH LLP Atlanta, GA 30363
100 Bayview Circle, Suite 5600 James R. Condo (005867)
Newport Beach, CA 92660 Kristine L. Gallardo (033975)
23 Co-Lead/Liaison Counsel for SNELL & WILMER L.L.P.
Plaintiffs One Arizona Center
24 400 E. Van Buren
Phoenix, AZ 85004-2204
26 Attorneys for C. R. Bard, Inc. and Bard
27 Peripheral Vascular, Inc.
28